

SEP 10 2010

FCC Mail Room

Petition for Exemptions to the Closed Captioning Requirements On the Basis Of Undue Burden

The Prince George's American Christian Television Systems (PGACTS, INC.) is a small 501(c)(3) non-profit organization located in Prince George's County Maryland. We are petitioning the FCC for an exemption from the closed captioning requirements based on the undue burden exemption.

PGACTS has been committed to providing high quality family oriented Christian television programming to help strengthen local churches in their mission to win souls for Christ. Our organization has had a strong presence in the local community over twenty years. Our local programming can be viewed in the Washington, DC Metropolitan area on local cable stations reaching over 400,000 households. We air our local programs every Sunday.

PGACTS is petitioning for an exemption for the closed captioning requirements on the basis of undue burden for the following reasons:

1. Close captioning would impose an undue burden on our small 501(c)(3) non-profit organization given the amount of money generally spent to have that type of service rendered onto all of our locally produced programs. See attached closed caption prices from two local close captioning companies ViTRACK (www.vitac.com) and National Captioning Institute (www.ncicap.org).
2. Providing close captioning would be difficult and technically infeasible for our small volunteer staff that works less than twelve hours per week.
3. Due to the current economic climate within the United States our local programming support is inherently fragile and close captioning would impose an economic burden on our small non-profit entity. Causing the organization a severe revenue loss. See attached financial balance sheet and profit and loss statement.

If PGACTS is unable to receive a waiver for an exemption for the closed captioning rule, we will be unable to provide the local community with positive Christian family oriented programming and our organization's existence will become minimal. This will be devastation to our organization and all of our local viewers. Our organization would like to suggest an alternative for close captioning. Our alternative is an interpreter performing sign language on some of our broadcast. We would place the interpreter in a small graphic box located on the right hand of the TV monitor.

Please see our organization's enclosed financials and documentation on close captioning cost. Thank you for your consideration in this vital matter.

Sincerely,



Crystal Jones, Director
Prince George's American Christian Television Systems

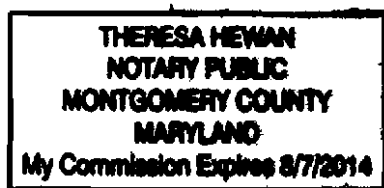
AFFIDAVIT

I, Crystal Jones, under penalty of perjury, hereby represent and warrant the following to the best of my knowledge:

1. I serve as the Director, for Prince George's American Christian Television System (PGACTS, INC.).
2. For the following reasons, this organization qualifies for an exemption to the closed captioning requirements of the FCC:
 - a. Close captioning would impose an undue burden on our small 501(c) (3) non-profit organization given the amount of money generally spent to have a close captioning company input close caption text onto all of our locally produced programs and then transcribe the text onto our local broadcast for airing.
 - b. Providing close captioning would be difficult and technically infeasible for our small volunteer staff that works less than twelve hours per week.
 - c. Due to the current economic climate within the United States our local programming support is inherently fragile and close captioning would impose an economic burden on our small non-profit entity.

Date: 9/1/10

Name: Crystal Jones



Shirley 9/1/10

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Subject: National Captioning Institute-Per our conversation!
From: "Lydy Pinzon-Dadley" <ldadley@ncicap.org>
Date: Tue, Aug 31, 2010 12:57 pm
To: <cjones@pgacts.org>
Attach: image001.png

Hello Crystal,

It was a pleasure speaking with you today, thank you for your call. I just checked with production and we can take the MPG2 file and deliver a caption MPEG file back to you via ftp. The format would be subtitles for the deaf and hard of hearing, no captions (with the black box in the background). This is the process if we were to do it as prerecorded and we would need the video file on our ftp today in order to meet the deadline. If I understand this correctly you'll be sending two-half hour programs. If this is the case, below are the estimated costs to do this job as prerecorded:

Subtitles for the hard of hearing: \$300/per half hour program-minimum rate
Encoding: \$125/per half hour program
Estimated costs for 2-half hour programs: \$850

If the program is coming as 1 hour program the costs is as follows:

Subtitles for the hard of hearing: \$495/program hour prorated to the quarter hour
Encoding: \$185 for one hour
Estimated costs: \$680

The costs to do the program as live captioning is \$110/program hour prorated to the quarter hour. Please contact me if you have any questions.

Best,

Lydy Pinzon-Dadley
National Captioning Institute
3725 Concorde Parkway, ste 100
Chantilly, VA 20151
703-917-7611 Direct
703-917-7600 V/TTY
(703) 917-7628 Fax
www.ncicap.org



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Subject: captioning!

From: "Heather York" <Heather-Y@vitac.com>

Date: Wed, Sep 01, 2010 4:24 pm

To: <cjones@pgacts.org>

Hi, Crystol! So nice to speak with you just now. I will provide you with a formal quote tomorrow but wanted to send you some information immediately.

MPG2-> MPG2 Captioning

Process: You upload an MPG2 file to VITAC's secure and encrypted FTP site. We create a caption file - transcribing the program, breaking the transcript into captions and timing those captions so that they appear in synch with program audio. We then encode those caption files to MPG2 format, and deliver to you. We prefer to have three business days but if provided with a schedule in advance can complete the show in 24 hours or less.

The rates below are for 10-45 episodes

Standard turnaround (2-3 days)

Caption Preparation: \$133

Encode to MPG2: \$97

Cost per show: \$230

Rush turnaround (48 hrs or less)

Caption Preparation: \$175

Encode to MPG2: \$125

Cost per show: \$300

Please note that we can use that same caption file we've prepared for MPG2 to encode to videotape, if needed.

Does that help?

More to come!

Heather

Heather York
Director, Marketing
VITAC
A Merrill Communications Company

1501 Wilson Blvd. Suite 1003
Arlington, VA 22209
Ofc: 703-807-2763
Fax: 703-807-2763
Cell: 703-216-4964

Learn more about VITAC at our [new website!](#)
Ask to [ViTRACK](#) your next project and follow it from start to finish!

P.G. ACTS INC
Profit & Loss
 July 2010

	Total				
	Jul 2010	May 31 - Jun 30, 2010 (PP)	% Change	Jul 2009 (PY)	% Change
Income					
INTEREST ON CD		16.11	-100.00%	98.70	-100.00%
Program Service Revenue	13,086.00	10,703.00	22.26479%	20,895.00	-37.37258%
Total Income	\$13,086.00	\$10,719.11	22.08103%	\$20,993.70	-37.66701%
Expenses					
BANK SVC CHARGES	1.00	2.00	-50.00%	27.93	-38.41962%
Bookkeeper Salary Expense				1,120.00	-100.00%
COMCAST CABLE FEES	3,592.35	3,229.15	11.24754%	90.60	-335.06623%
COMPUTER					
MAINTENANCE				2,025.00	-100.00%
WEBSITE		300.00	-100.00%		
Total COMPUTER	0.00	300.00	-100.00%	2,025.00	-100.00%
CONTRACTOR					
BOOKKEEPER	20.97	20.97	0.00%		
Total CONTRACTOR	20.97	20.97	0.00%	0.00	0.00
CREDIT CARD EXPENSE	82.86	45.48	82.18997%		
GIFTS				267.42	-100.00%
INTERNET	18.25			209.66	-31.29543%
Marketing	243.00				
OFFICE EXPENSE				39.22	-100.00%
Paychex Monthly Fees	74.61	181.83	-58.96717%		
Payroll Processing Fees		121.22	-100.00%	133.27	-100.00%
Payroll Tax Expense	459.00	451.35	1.69492%	554.18	-17.17194%
POSTAGE				2.78	-100.00%
PROFESSIONAL FEES	500.00				
ACCOUNTING		500.00	-100.00%	500.00	-100.00%
CONSULTANTS	2,250.00	2,250.00	0.00%	2,250.00	0.00%
Total PROFESSIONAL FEES	2,750.00	2,750.00	0.00%	2,750.00	0.00%
Program Manager Salary Expense	6,000.00	5,900.00	1.69492%	6,036.00	-0.59642%
Reimbursements					
Cable				113.00	-100.00%
Cell Phone				86.00	-100.00%
Travel Expenses				255.00	-100.00%
Verizon Fios Reimb				58.00	-100.00%
Total Reimbursements	0.00	0.00	0.00	512.00	-100.00%
Rent Expense					
Rent- Beechley Square	934.00	1,668.00	-50.00%	1,790.00	-47.82123%
Total Rent Expense	934.00	1,668.00	-50.00%	1,790.00	-47.82123%
Retirement (Crystal's)		1,192.00	-100.00%	1,184.00	-100.00%
SOFTWARE	426.89			89.90	377.07453%
TELEPHONE				0.00	
VONAGE	83.79	83.79	0.00%		
Total TELEPHONE	83.79	83.79	0.00%	0.00	0.00
VERIZON (Broadband)				183.63	-100.00%
Verizon Fios/Broadcast Fee				27,490.00	-100.00%
VERIZON WIRELESS (Broadband)		86.06	-100.00%	192.05	-100.00%
WEBSITE		18.95	-100.00%		
Total Expenses	\$14,888.72	\$16,250.80	-9.61233%	\$44,697.62	-37.13758%
Net Operating Income	\$ -1,602.72	\$ -5,531.69	71.02658%	\$ -23,703.92	33.23859%
Net Income	\$ -1,602.72	\$ -5,531.69	71.02658%	\$ -23,703.92	33.23859%

Friday, Sep 03, 2010 11:21:21 AM GMT-4 - Accrual Basis

P.G. ACTS INC
Balance Sheet
As of July 31, 2010

	Total			
	As of Jul 31, 2010	As of Jul 31, 2009 (PY)	Change	% Change
ASSETS				
Current Assets				
Bank Accounts				
ING	20,063.95	20,063.95		
MONEY MARKET	80,257.83	99,850.72	-19,592.89	-19.62%
PNC Bank - CHECKING	32,038.04	42,410.19	-10,372.15	-24.46%
PNC CD - 573(90)	0.00	0.00	0.00	
PNC CD - 581(89)	0.00	0.00	0.00	
PNC CD 602(88)	0.00	0.00	0.00	
Total Bank Accounts	\$ 132,359.82	\$ 142,260.91	-\$ 9,901.09	-6.96%
Other Current Assets				
PREPAID EXPENSE	0.00	0.00	0.00	
PREPAID INSURANCE	0.00	0.00	0.00	
Total PREPAID EXPENSE	\$ 0.00	\$ 0.00	\$ 0.00	
Total Other Current Assets	\$ 0.00	\$ 0.00	\$ 0.00	
Total Current Assets	\$ 132,359.82	\$ 142,260.91	-\$ 9,901.09	-6.96%
Fixed Assets				
ACCUM Depreciation	-138,879.00	-131,009.30	-7,869.70	-6.01%
FIXED ASSETS			0.00	
COMPUTER	10,392.06	10,392.06	0.00	0.00%
FURNITURE & FIXTURES	884.99	884.99	0.00	0.00%
OFFICE EQUIPMENT	2,461.14	2,461.14	0.00	0.00%
PROGRAMING EQUIPMENT	131,959.23	131,959.23	0.00	0.00%
Total FIXED ASSETS	\$ 145,697.42	\$ 145,697.42	\$ 0.00	0.00%
Total Fixed Assets	\$ 6,818.42	\$ 14,688.12	-\$ 7,869.70	-53.58%
TOTAL ASSETS	\$ 139,178.24	\$ 156,949.03	#####	-11.32%
LIABILITIES AND EQUITY				
Liabilities				
Current Liabilities				
Credit Cards				
Credit card payable-MasterCard	8,037.56	2,062.55	5,975.01	289.69%
Total Credit Cards	\$ 8,037.56	\$ 2,062.55	\$ 5,975.01	289.69%
Other Current Liabilities				
ACCONTS PAYBLE	0.00	0.00	0.00	
Payroll Liabilities	-0.06	0.00	-0.06	
Total Other Current Liabilities	-\$ 0.06	\$ 0.00	-\$ 0.06	
Total Current Liabilities	\$ 8,037.50	\$ 2,062.55	\$ 5,974.95	289.69%
Total Liabilities	\$ 8,037.50	\$ 2,062.55	\$ 5,974.95	289.69%
Equity				
Opening Bal Equity	107,146.79	107,146.79	0.00	0.00%
Retained Earnings	31,708.31	50,836.77	-19,128.46	-37.63%
Net Income	-7,714.36	-3,097.08	-4,617.28	-149.06%
Total Equity	\$ 131,140.74	\$ 154,886.48	#####	-15.33%

TOTAL LIABILITIES AND EQUITY	\$	139,178.24	\$	156,949.03	#####	-11.32%
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Friday, Sep 03, 2010 12:53:00 PM GMT-4 - Accrual Basis